

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FORTRESS CREDIT CORP.,

Plaintiff,

-against-

THAI UNION NORTH AMERICA, INC.,

Defendant.

Civil Action No. 24-cv-8399-MKV

**STIPULATION REGARDING DEFENDANT’S TIME TO ANSWER,
MOVE AGAINST, OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff Fortress Credit Corp. (“Fortress”) and defendant Thai Union North America, Inc. (“Thai Union” and, together with Fortress, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on October 3, 2024, Fortress filed a Summons and Complaint (ECF No. 1-1) in the Supreme Court of the State of New York, County of New York (the “State Court”), initiating an action against Thai Union;

WHEREAS, on October 15, 2024, counsel for Thai Union accepted service of the Summons and Complaint on behalf of Thai Union;

WHEREAS, on October 30, 2024, the Parties filed a stipulation in the State Court in which they agreed that Thai Union shall have until December 3, 2024 to answer, move against, or otherwise respond to the Complaint (ECF No. 1-3);

WHEREAS, on November 4, 2024, Thai Union removed the action to this Court (ECF No. 1);

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that Thai Union shall have until December 3, 2024 to answer, move against, or otherwise respond to the Complaint.

IT IS FURTHER STIPULATED AND AGREED that, in entering into this Stipulation, the Parties preserve, and do not waive, all their respective rights, claims, and defenses.

IT IS FURTHER STIPULATED AND AGREED that electronic signatures on this Stipulation shall have the same binding effect on the Parties as original signatures.

DATED: November 7, 2024
New York, New York

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Attorneys for Thai Union North America, Inc.

SO ORDERED.

New York, New York

Dated: _____, 2024

UNITED STATES DISTRICT COURT JUDGE